



HEALTH POLICY COMMISSION

Registration of Provider Organizations Program: Frequently Asked Questions

Issued 04/23/2015

The MA-RPO Program released updated FAQs in June 2018 that supersede the guidance contained in this document. Please see the June 2018 FAQs for the most up-to-date information.

The Health Policy Commission (HPC) recognizes that each Provider Organization has a unique structure and that multiple factors may influence how it completes the registration materials. The questions below are meant as general guidance. The HPC encourages Provider Organizations to contact HPC-RPO@state.ma.us with specific questions that are not clearly answered here.

Out-of-State Reporting Requirements

Q1: My organization is trying to determine whether we meet the \$25,000,000 Net Patient Service Revenue (NPSR) and 15,000 Patient Panel registration threshold¹. My organization has three facilities located in Massachusetts, and a fourth located in Rhode Island. Should my organization include the revenue and patients from the Rhode Island facility in its total?

A: A Provider Organization is not required to include the NPSR or Patient Panel of facilities located outside of the Commonwealth, even if the Provider Organization establishes contracts on behalf of that facility or site.

While a Provider Organization can exclude the NPSR and Patient Panel of facilities and sites located outside of Massachusetts, it must include the total NPSR and Patient Panel of facilities and sites located within Massachusetts, regardless of whether some of the patients seen at those facilities and sites reside in a different state.

Q2: In the Frequently Asked Questions released on October 14, 2014, the HPC stated that it expects the uppermost corporate entity with a primary business purpose of health care delivery or management to act as the registering entity. The uppermost corporate entity in my organization is located outside of Massachusetts. Which entity should act as the registering entity for my organization?

¹ For a complete description of the registration thresholds, please see regulation [958 CMR 6.00](#), *Registration of Provider Organizations* or the current version of the [Data Submission Manual](#).

A: If an out-of-state entity which has a primary business purpose related to health care delivery or management has a substantial direct or indirect ownership or controlling interest in a Massachusetts-based Provider Organization subject to 958 CMR 6.00, that out-of-state entity must act as the registering entity for the purpose of the RPO Program.

Q3: Is my organization required to report its corporate affiliates and contracting affiliates located outside of Massachusetts?

A: Provider Organizations are required to report all of their corporate and contracting affiliates, regardless of where those affiliates are physically located. However, the HPC may allow more limited reporting by certain large Provider Organizations for which nearly all of their revenue is generated outside of Massachusetts. If you believe your organization may qualify for more limited reporting, please contact the HPC at HPC-RPO@state.ma.us.